

### REMARKS

Claims 1-22 are pending in this application. Applicants respectfully request that the examiner reconsider the rejections of claim 1-22 in light of the arguments presented below.

### **Rejections under 35 U.S.C. § 102**

Claims 1-5, 7-9, 11-16, and 18-20 were rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent 6,445,968 to Jalla. As will be fully explained below, Jalla does not each and every feature of claims 1, 7, 14, and 18.

Claim 1 includes the features of receiving a request for an ad hoc task which interrupts a schedule for the planned project tasks; readjusting the project tasks to capture the interruption of the ad hoc task; and requesting a report for each member in the group, the report configured to display progress of the project tasks for each member, wherein the report is capable of presenting the ad hoc tasks for each member of the group over a tracking period. According to the Examiner Jalla teaches each and every element of the above features. With regard to the feature of receiving a request for an ad hoc task which interrupts a schedule for the planned project tasks, the Examiner refers to column 4, lines 24-36. The cited section refers to a sentence that states more tasks may be inserted by the overall manager at the end of the working day or at the beginning of the next working day. Applicants respectfully submit that the cited section is silent as to the additional tasks interrupting a schedule for the planned project tasks as specified in claim 1. With regard to the feature of readjusting the project tasks to capture the interruption of the ad hoc task, the Examiner refers to column 4, lines 24-36 again. As stated above, Jalla is silent as to the additional tasks interrupting a schedule for the planned project tasks and it cannot be reasonably stated that the cited section does any

readjustment as Jalla never states this and the Examiner is creating this feature from the cited section. Furthermore, the Examiner has stated that the task schedule is inherently readjusted, however, the Examiner has not shown where Jalla states that the additional tasks affect the schedule, nor do Figures 2A or 2B show any readjustments due to any changes. As Jalla teaches that the assignments are generated for each day (see Figures 2A and 2B), and that the additions are added at the end of the day or beginning of next day (see column 4, lines 26-27), Applicants respectfully submit that the Examiner has not provided rationale or evidence tending to show inherency. In relying on inherency, the examiner must provide a basis and/or technical reasoning to reasonably support that the allegedly inherent characteristic necessarily flows from the teaching of the prior art (MPEP 2112). The Examiner has also asserted that the same section of Jalla teaches the feature of requesting a report for each member in the group, the report configured to display progress of the project tasks for each member, wherein the report is capable of presenting the ad hoc tasks for each member of the group over a tracking period. Here again the Examiner asserts that it is inherent that Jalla will provide a report of ad-hoc tasks based on the statement that "each member can report the progress of his tasks at the end of the initial estimated time." Here the members report what they actually did in light of what they were assigned. The Applicants submit that this sentence is referring to the members reporting the progress of their assigned tasks at the end of the day and has nothing to do with the feature of requesting a report for each member in the group. Accordingly, claims 1-6 are not anticipated by Jalla for at least the above stated reasons.

Claim 18 includes the features of program instructions for receiving a request for an ad hoc task which interrupts a schedule for the planned project task; program instructions for readjusting the project tasks to capture the interruption of the ad hoc task; and program instructions for requesting a report for each member in the group, the report configured to display progress of the project tasks for each member, wherein the report is capable of

presenting the ad hoc tasks for each member of the group over a tracking period. For at least the reasons stated above with regard to claim 1-6, claims 18-22 are not anticipated by Jalla.

Claim 7 includes the feature of receiving a request for an ad hoc task which interrupts a planned task schedule; storing the ad hoc task; and in response to receiving the ad hoc task, the method further includes, readjusting the planned task schedule to incorporate the interruption caused by the ad hoc task. Jalla does not teach storing the ad hoc task and the Examiner has not indicated where in Jalla the ad-hoc task has been disclosed. Furthermore, with regard to claims 12 and 13, the Examiner asserts that column 4, lines 25-37 teach the claimed features. Applicants respectfully submit where in that section the features of generating a warning if more than a target limit of the ad hoc tasks are received by a group member; and redirecting ad hoc tasks received by a first group member in excess of a target limit to a second group member. Jalla is silent as to generating a warning when exceeding a target limit of ad-hoc tasks and redirecting ad hoc tasks received by a first group member in excess of a target limit to a second group member, as well as adding any ad hoc tasks. Applicants respectfully request that the Examiner specify where these features are taught as the cited section is silent to generating a warning and redirecting any tasks. In addition, the Applicants respectfully request that the Examiner provide the technical basis for the inherency for storing and reallocating the tasks, when Jalla is silent as to this aspect and the original owner of the task can complete an additional task under Jalla. Accordingly claims 7-13 are not anticipated by Jalla.

Claim 14 includes the feature of an ad hoc database, the ad hoc database including non-planned tasks performed by the group members, the non-planned tasks interrupting the planned tasks. The Examiner states that column 4 of Jalla again discloses this feature. The applicants respectfully disagree with this statement as nowhere does Jalla disclose a database that stores non-planned tasks. If the Examiner continues to assert this rejection, the

Applicants would like to know where in column 4, lines 24-36 a database storing non-planned tasks is disclosed. In addition, claim 15 specifies a report generator, the report generator configured to pull data from the databases to track progress of the planned tasks and list the non-planned tasks for each member of the group. The Examiner states that the same section of column 4 specifies this feature. Applicants request that the Examiner specify how a member reporting a progress of a task assigned from the system of Jalla, discloses a report generator that list non-planned tasks for the member. For at least these reasons claims 14-17 are not anticipated by Jalla.

In light of the above arguments, the Applicants respectfully request that the rejections under 35 USC 103 also be removed. Furthermore, Srinivasan fails to cure any of the deficiencies of Jalla noted above.

Applicants respectfully request a Notice of Allowance based on the foregoing remarks. If the Examiner has any questions concerning the present amendment, the Examiner is kindly requested to contact the undersigned at (408) 774 6921. If any other fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP132). A copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
MARTINE, PENILLA & GENCARELLA, LLP



Michael L. Gencarella, Esq.  
Reg. No. 44,703

Martine Penilla Gencarella, LLP  
710 Lakeway Drive, Suite 200  
Sunnyvale, California 94085  
Tel: (408) 774-6921  
**Customer Number 32291**